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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MIROSLAV KEFURT, derivatively on behalf of BREMACH, INC., a Nevada corporation,) Case No.: 2:22-cv-01774-JAD-BNW

Plaintiff,)

vs.)

REINIER “RAY” HOOGENRAAD, an individual, BENJAMIN “BEN” MONTGOMERY, an individual,)
Defendants.)

BREMACH, INC., a Nevada corporation.)

Nominal Defendant)

FIRST STIPULATION AND ORDER
TO CONTINUE DISCOVERY
DEADLINES AND TRIAL

Plaintiff MIROSLAV KEFURT (“Plaintiff”), by and through his counsel Leah Martin Law, REINIER “RAY” HOOGENRAAD (“Defendant RH”), and BENJAMIN “BEN” MONTGOMERY (“Defendant BM”) (together the “Defendants”) (collectively the “Parties”), hereby stipulate and agree to extend the discovery deadlines ninety days and trial as set forth herein. This is the first stipulation for extension of discovery.

I. DISCOVERY COMPLETED

1. The Plaintiff has submitted initial documents and witnesses;
2. Plaintiff propounded his first set of written discovery on Defendant RH;

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II. DISCOVERY THAT REMAINS TO BE COMPLETED

3. Plaintiff to serve its first set of written discovery on Defendant BM;
4. Defendants to submit their initial documents and witnesses;
5. Depositions of the Parties, experts and third-party witnesses;
6. Disclosure of expert witnesses;
7. Disclosure of rebuttal expert witnesses;
8. Any additional supplemental written discovery that may be needed;
9. Any other discovery which may be determined as relevant and necessary by the Parties.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN THE CURRENT DEADLINES

The Plaintiff has been actively participating in discovery but requires additional time to complete discovery. The Defendants are exploring retention of counsel. This stipulation is not submitted for any improper purpose or to unnecessarily delay the proceedings. The Parties submit that good cause exists to grant the stipulated ninety-day extension of the discovery deadlines and trial for the following reasons: Defendant RH has not completed disclosures or filed any responses to Plaintiff's written discovery. Defendant BM has not filed an answer to Plaintiff's complaint, disclosures, and Plaintiff has not had an opportunity to conduct discovery relating to Defendant BM. Finally, Defendants are *pro se* and special care must be taken.

IV. PROPOSED EXTENDED DEADLINES

Deadline	Current Deadline	Proposed
Amend Pleadings/Add Parties	May 3, 2023	Aug 1, 2023
Initial Experts	Jun 5, 2023	Sep 3, 2023
Designation of Rebuttal Experts	Jul 6, 2023	Oct 4, 2023
Close of Discovery	Aug 3, 2023	Nov 1, 2023
Dispositive Motions	Sep 4, 2023	Dec 3, 2023

Joint Pre-Trial Order

Oct 5, 2023

Jan 3, 2024

V. THIS EXTENSION WILL AFFECT THE TRIAL DATE

The requested extension would affect the trial date. The Parties respectfully request that the trial date be rescheduled to the Court's next available trial date.


VI. CONCLUSION

Based upon the foregoing, the Parties respectfully request and submit that good cause exists, and for the Court to adopt the forgoing deadlines and reschedule trial in this case.

Dated this 18 day of July 2023

Dated this 17th day of July 2023

/s/ Leah Martin



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Defendant in Pro Se

Dated this 18 th day of July, 2023



Reinier Hoogenraad
211 North Star Lane
Newport Beach, CA 92660
Defendant In Pro Se

ORDER
IT IS SO ORDERED

DATED: 9:17 am, July 19, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE